REMARKS

This paper is responsive to the Non-Final Office Action dated August 16, 2010. No extensions of time and/or additional claim fees are believed to be due, however, the Commissioner is hereby authorized to treat this paper as a Petition for any needed extension of time and to charge any fees due to Deposit Account No. 50-0959, Attorney Docket No. 109769.0020.

Claims 1 through 5, 8 through 14 and 23 through 27 are pending in this application. Claim 10 has been amended. Support for the amendment to claim 10 can be found in the specification as filed. Accordingly, no new matter has been added. As such, entry of the amendment and consideration of the remarks which follow is respectfully requested.

I. Specification:

The term "computer usable medium" has been removed from the language of claim 10.

II. The 35 U.S.C. § 103(a) Rejections:

Claims 1 through 5 and 8 through 26 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,311,214 (Rhoads), U.S. Patent No. 6,494,571 (Finkel) and U.S. Patent No. 6,704,120 (Leone).

The rejection of claims 1 through 5 and 8 through 26 is based upon an unsuggested combination of disparate disclosures which do not teach or suggest the claimed subject matter, either by themselves or from the knowledge of one skilled in the art.

The Rhoads patent merely discloses encoded greeting cards which, when read by an image capture device of a computer, prompts the display of a corresponding web page or other computerized presentation. See Rhoads column 1, lines 49-52: "The centerpiece of the invention is that an object of paper product so-scanned contains digital information that can be quickly read and acted upon by an appropriately configured device, computer or appliance." Also see Rhoads at column 10, lines 1-29: "In accordance with a further embodiment of the invention, greeting cards and the like are encoded (e.g., by texturing, printing, etc.) with Bedoop data. On receiving such a card, a recipient holds it in front of the image capture device on a laptop or other computer. The computer responds by displaying an internet web page that has a stock- or customized-presentation (image, video, audio-video, etc.)to complement that presented on the greeting card." This has nothing whatsoever to do with printing a greeting card by the use

of a downloaded program and a web browser. As acknowledged by the Examiner, Rhoads does not teach or suggest a first program and defining data which is downloaded from a server to client for printing a card.

The Finkel patent describes a printing method and program wherein the user can set the actual print area of the image to be printed to be larger than the primary printable areas, and to extend beyond perforations in the print paper to achieve edge-to-edge printing. More specifically, the Finkel patent is concerned with having the print area extend beyond perforations and to one edge of the "printing medium" (i.e., paper) so that there are only three perforation lines, as shown in FIGS. 6-9. See Finkel column 6, lines 47-60: "To achieve this result, the user can set the actual print area of the image to be larger than the primary printable area using the application program." As acknowledged by the Examiner, the Finkel patent does not teach or suggest the downloading of any program or defining data for printing. The Finkel patent teaches only, "...a personal computer 131, including a central processing unit, loaded with an operating system program and an application program such as MICROSOFT WORD, ..." (Finkel, column 6, lines 38-40). Also, Finkel does not teach downloading of any defining data other than the print area parameters, so there is no teaching at all of any other editing functions enabled by a program which is downloaded and launched by a web browser.

Leone discloses a data template for a personalized printed product incorporating image processing operations. Specifically, Leone is concerned with image processing in the form of imaging utilities which can be accessed and used to modify a scanned image so that a modified image can be included in the data template for a greeting card to be printed. See Leone column 1, Field of the Invention, column 2, lines 8-15 and column 3, lines 13-16: "automating the utilities that provide these image modifications would allow their use by an unskilled operator in preparing a greeting card, invitation, or similar type of personalized printed product." Also see Leone column 4, lines 8-12: "...providing a flexible set of imaging utilities for automated enhancement of personalized printed product, where the set of imaging utilities can be regularly updated and available to customers in preparing printed products", and at column 4, lines 38-42: "a new personalized printed product to be introduced that uses an image processing operation that is not available with the original software application itself." In Leone, a software application 60 runs on a personal computer to generate a personalized printed product (i.e.

greeting card), and which associates each product or card design with a product template from a product template database. The application 60 has the ability to extend or augment itself based on the needs of specific products, and specifically for product templates which include an image processing operation for a scanned image. The application does this by accessing an image processing program 80 to be under the control of the application 60. This type of program augmentation, which occurs during the execution of a main program, is referred to as "reflection" by those skilled in the Java programming language. Leone describes the use of XML or Java for page definition languages and standard to define a product template for data presentation. Using XML as the preferred embodiment of the product data, Leone describes three different methods for the inclusion of code related to the special imaging processing. This is not the same or equivalent to the claimed program of the present invention. Leone describes an alternate embodiment at column 8, lines 49-54: "A downloaded Java class that serves as image processing program 80 could optionally be embodied as an applet. This would allow application 60 to operate within a Web browser, offering the advantage of widespread access to imaging and printing capabilities for internet users." But downloading of an image processing program is not the same as the claimed "first program" or "plug-in program" which includes modification functions for modifying the defining data and assembly functions for assembling a printed product for printing. Those functions are performed by Leone's application 60 which as descried runs on the client computer.

Furthermore, the portion of the Leone patent which describes the applet embodiment is technically incorrect because the interrelationship between the application 60 and the image processing program 80 is reversed. If application 60 were written as an applet to operate within a Web browser, then the image processing program 80 could also be embodied as an applet. As described, application 60 is clearly the controlling client-resident program, so that the implementation options of the image processing program 80 are dependent upon application 60. In Leone at column 8, lines 49-54, this description is reversed.

In addition to this fundamental error, the teaching of Leone is incomplete and therefore non-enabling, even for one skilled in the art of Java programming. Those skilled in the art would know that the Java application 60 could be invoked equally as well from a browser as from a command line. As an example, if application 60 resided on a web server, a sample command to

start it might be: http://webserver.com/program60.jar. In this case, the web browser serves no function other than a means to invoke application 60, and application 60 would run with no interaction with the browser (i.e., it would not be executed in the sandbox). Leone does not provide this description. Further, Leone does not teach how program 80, if developed as an applet, can be invoked and communicate with application 60 when application 60 is not an applet. Also because applets execute in the sandbox, they are prohibited from access (read or write) to the client's local disk. It is apparent to one skilled in the art that if application 60 and program 80 are applets, then the embodiment described at column 6, lines 22-24, with the templates database stored locally, is not an option The privacy restrictions of the sandbox restrict this. Leone does not teach that the network or remote host options must be used.

Leone does not teach or suggest that the application 60 can be downloaded, and in fact consistently teaches the opposite. See Leone, column 6, lines 6-8 and 40-43: "It should be noted that image processing program 80 need not be on a separate host computer, but could alternately be locally stored on the same computer that hosts application 60." This teaches away form the invention as claimed wherein the "first program" or "plug-in program" are stored on and downloaded from a server, and which retrieve the product-defining data – enable modification of the data – and assemble the product for printing, is downloaded from a server. Further, the "first" or "plug-in" programs as claimed differ from an applet in several respects, including: 1.) access via a web browser provides a way for the programs to register themselves and remain permanent on the client computer; and 2.) the programs do not have the same security restrictions of an applet and have access to a local disk; providing a greater range of flexibility on where input files are located; in addition, the programs have write capability and are able to update definition files such that user-specified manipulations are recorded for future use.

By disclosing only the downloading of an applet as an image processing program, Leone does not teach or suggest the claimed use of a plug-in program with these features, functions and benefits. Furthermore, the Leone alternative embodiment, wherein application 60 and program 80 are applets, requires a download each time that the browser invokes the program. For larger programs, this is an inconvenience and is inconsistent with the objectives of the present invention.

According to the present application, each page of information, commonly referred to as a web page or web site, is identified by a Universal Resource Locator ("URL") which identifies the server on which the web site is stored and the location of that particular web site on the server. A web browser program, on the other hand, is a piece of software used by a computer to communicate with networks of servers to retrieve and display web pages identified by a particular URL.

For example, claim 10 was previously amended to recite the limitation of means for modifying a browser program on a personal computer of a user to allow the user to edit the defining data within the browser program. As taught in the present application, the means for modifying the browser program is a plug-in which extends the capabilities of the browser to allow the user to download and edit data defining a greeting card within the browser program. The plug-in is a small piece of software loaded into memory by a larger program, i.e., the web browser that adds a new feature to the browser. One function of the engine component of the plug-in is to make selected assets, such as design elements defined by the defining data, for a printed product available in the browser such that they can be edited by the user. Thus, the desired assets are selected by the user from assets stored on the server and downloaded to the user's computer to be customized by the user. Modifying the assets downloaded to the user's computer does not modify the assets selected from the server. The assets that were downloaded and modified by the user remain in their original form on the server for others to download and modify to fit their needs.

The explicit language of the claims clearly defines that the program code "enables modification functions within said web browser program" to allow the user to edit the data defining the printable product within the browser program. The claims are clear that the first program is downloaded and installed on the user's computer. Data defining the selections made by the user over the Internet regarding the decorative designs that are to be assembled on the card are downloaded to the user's computer as an appropriately formatted file, such as a CPT file, for example. The display, editing and assembly of the printable product defined by the downloaded file are to be performed by the plug-in, which is installed on the user's computer. Neither Rhoads, Finkel or Leone make any mention of modifying the browser program on the

user's computer or editing the defining data within the browser program once the defining data is downloaded to the user's computer.

Claim 27 is rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,552,994 (Cannon), U.S. Patent Publication No. 2001/0034746 (Tsakiris) and "Helpers and Plug-In's". This rejection should be withdrawn because neither of these references suggests or otherwise makes obvious the claimed subject matter. Claim 27 defines each of the attributes of the invention as a system for composition and printing of greeting cards. Claim 27 contains each of the limitations of claims 1 through 26. The Cannon patent is an electronic database of greeting card attributes which are selected prior to printing. The Cannon patent is not concerned with and does not teach or suggest editing and scaling of each panel of a greeting card by use of a plug-in program which is downloaded to a web browser. The Tsakiris application describes a generation of "web cards" (web pages which are read by mobile devices) used to expedite internet browsing requests with a mobile device by avoiding tedious input and clicking through hyperlinks. The reference to "web cards" has no correlation or relevance to paper "greeting cards" as defined by the present application. Neither Cannot nor Tsakiris, nor the article "Helpers and Plug-In's" teach the claimed combination of a plug-in program downloaded to a web browser, with a plug-in program including an engine and assembly component for selection and editing of assets of a greeting card, including selected greeting card design elements and asset information for display, editing and printing assembly for all panels of a greeting card, and printing assembly including scaling and resizing for division into greeting card panels for printing, all as defined by claim 27.

Claim 27 was recently amended to specifically to define the use of an internet web browser program (as opposed to using a dedicated desktop publishing program such as Print Shop) to create (e.g., edit and modify) and print a greeting card, by use of a plug-in program which is detected and downloaded by the web browser, to extend the capabilities of the browser to allow the user to download and edit data defining a greeting card within the browser program. The specific card selection, text editing and print formatting functions enabled by the plug-in program are expressly recited in claim 27.

The concept of using an internet web browser such as Microsoft Internet Explorer or Netscape Navigator as an editing and printing program is not taught by the prior art, particularly

as it applies to the selection, editing and printing of greeting cards, as is not particularly defined by the claims. The cited references do not teach the modification of a web browser by the user of a plug-in program.

III. Conclusion

Accordingly, reconsideration and withdrawal of 35 U.S.C. § 103(a) rejections of claims 1 through 5, 8 through 14 and 23 through 27, is believed due and is respectfully requested.

For at least the foregoing reasons, claims 1 through 5, 8 through 14 and 23 through 27 are believed to be in condition for allowance, and a Notice of Allowance is respectfully requested. Should the Examiner wish to discuss any of the foregoing in more detail, the undersigned attorney would welcome a telephone call.

Respectfully submitted,

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